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Attorneys for Plaintiff

**IN THE DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

QIAN XIAOLI,)	Civ. No. 07-0017
)	
Plaintiff,)	
)	STIPULATION
vs.)	
)	
GRACE INTERNATIONAL, INC.,)	
)	
Defendant.)	
)	

Plaintiff Qian Xiaoli and Defendant Grace International, Inc., hereby stipulate and agree as follows:

1. Plaintiff's Motion For Order In Aid Of Judgment is withdrawn subject the following conditions.

2. Defendant shall, and hereby does, assign and transfer to Plaintiff all of Defendant's rights to demand, sue for, and recover from the United States any Social Security taxes wrongfully or erroneously paid by Defendant.

3. Defendant shall take any such steps as may be necessary to assist Plaintiff in recovering the said taxes, including providing to Plaintiff any tax records, employment records, or other documents or information that may be necessary to the claim, and executing any such further agreements or other documents as may be necessary to render Defendant's assignment of its rights to Plaintiff valid and effective, and Plaintiff's claims against the United States enforceable.

1 4. Pursuant to the preceding paragraph, the parties agree that the terms of this stipulation be
2 adopted as an order of the Court, in order to make the assignment valid and effective, and the claims
3 enforceable, under the Assignment of Claims Act, 31 U.S.C. § 3727, which restricts voluntary
4 assignments of claims against the United States, but allows for assignments by order of court.

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6 5. Plaintiff's withdrawal of her Motion For Order In Aid Of Judgment is without prejudice
7 to her filing another such motion on or before March 10, 2009, in the event the underlying judgment
8 in this matter remains unsatisfied.

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10 6. Defendant shall not sell, sublease, or otherwise encumber its leasehold interest in its
11 factory site on Texas Road, Susupe, Saipan, CNMI, prior to March 10, 2009, without the prior
12 agreement of Plaintiff.

13
14 Dated: July 25, 2008.

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16 O'CONNOR BERMAN DOTTS & BANES
17 Attorneys for Plaintiff

TORRES BROTHERS LLC
Attorneys for Defendant

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19 By: _____/s/_____
20 Joseph E. Horey

By: _____/s/_____
Joaquin DLG. Torres

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23 *3232-01-080722-PL-agreement to withdrawal.wpd*
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